

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOUREY NEWELL, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

JR CAPITAL, LLC

Defendant.

Case No.

2:25-cv-01419-GAM

CLASS ACTION

JURY TRIAL DEMANDED

UNOPPOSED MOTION FOR EXTENSION OF TIME

The Plaintiff, Jourey Newell, with the consent of Defendant JR Capital, LLC respectfully requests that he receive an extension of time to May 19, 2025 in order to oppose Defendant's Motion to Dismiss (ECF No. 13). This additional time is required to address all of the arguments made in the motion as well as due to the press of existing prior business and obligations.

RESPECTFULLY SUBMITTED AND DATED this April 28, 2025.

/s/ Andrew Roman Perrong

Andrew Roman Perrong, Esq.

Pa. Bar #333687

Perrong Law LLC

2657 Mount Carmel Avenue

Glenside, Pennsylvania 19038

Phone: 215-225-5529 (CALL-LAW)

Facsimile: 888-329-0305

a@perronglaw.com

Attorney for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I, Andrew Roman Perrong, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

DATED this April 28, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.